

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc., (“AMS”) jointly move the court to dismiss these actions without prejudice and terminate them from the docket of the court, parties to bear their own costs.

Respectfully:

/s/ Barbara Binis

Barbara Binis
Stephen J. McConnell
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmit.com
smcconnell@reedsmit.com
Attorneys for Defendant American Medical Systems, Inc.

/s/ Ryan M. Anderson

Ryan M. Anderson
BIGHORN LAW
716 South Jones Boulevard
Las Vegas, NV 89107
702.333.1111 (phone)
702.507.0092 (fax)
ryan@bighornlaw.com
Attorney for Plaintiffs on Exhibit A

Dated: January 23, 2019

EXHIBIT A – BIGHORN LAW

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-CV-06068	Kristen Mary Baldez v. American Medical Systems, Inc.
2:16-CV-08228	Beverly Stehling v. American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis